

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED:	
v.	:	CRIMINAL NO.	
PAUL ZIMMERMAN	:	VIOLATION:	18 U.S.C. § 2314 (Interstate transportation of stolen property - 4 Counts) 18 U.S.C. § 2(b) (Causing an offense against the United States)

INDICTMENT

Counts One through Four

THE GRAND JURY CHARGES THAT:

At times material to this indictment:

1. BEF, Inc. was a company in the business of refurbishing and selling used "24 hour" portable photograph development laboratories (photo labs). The price of these photo labs ranged from thousands of dollars to tens of thousands of dollars.
2. BEF operated from several locations in and around Allentown, Pennsylvania, and maintained executive offices at 1670 East Race Street, Allentown, Pennsylvania.
3. BEF employed defendant PAUL ZIMMERMAN as its sales manager.
4. BEF's customers included retail photo developers and wholesale distributors who in turn sold to retail photo developers.

5. BEF attempted to prevent theft and loss through certain financial and shipping controls. These controls required customers to pay, or qualify for credit, before BEF shipped photo labs to them. These controls also required BEF loading dock personnel to match shipment memoranda to sales orders and invoices.

6. From in or about 2001 through in or about June 2002, defendant PAUL ZIMMERMAN stole BEF photo labs with an aggregate retail value of over \$100,000 and sold them to BEF customers for cash.

7. Defendant PAUL ZIMMERMAN defeated BEF's financial and shipment controls by several methods, including the following: he misdirected photo labs for which legitimate BEF customers had already paid; he fabricated sales records to indicate that photo labs had been ordered by customers to whom BEF had extended credit (when in fact defendant ZIMMERMAN had taken cash from other customers for those photo labs); and he falsified and destroyed shipment records.

8. On or about the dates listed below, in the Eastern District of Pennsylvania, and elsewhere, defendant

PAUL ZIMMERMAN

unlawfully transported, and willfully caused another to unlawfully transport, in interstate commerce, goods of a value of \$5,000 or more, that is, "24 hour" portable photograph development laboratories, knowing the same to have been stolen, converted or taken by fraud from BEF, Inc.

Count	On or About	Description	Transported From	Transported To
1	11/15/2001	1 BEF photo lab, Fuji model PP 1250V, and accessories, priced at \$12,000 (Order No. 3886; Invoice No. 2451).	Allentown, PA	Brooklyn, NY
2	12/21/2001	1 BEF photo lab, Fuji model PP 1257V, and accessories, priced at \$12,000 (Order No. 3929; Invoice No. 2494).	Allentown, PA	Brooklyn, NY
3	1/16/2002	1 BEF photo lab, Fuji model PP 1825V-A, priced at \$18,000 (Order No. 3996, Invoice No. 2565).	Allentown, PA	Manassas, VA
4	2/1/2002	3 BEF photo labs, all Fuji model PP 1828V-A, and accessories, priced at \$20,000 each, for a total of \$60,000 (Order Nos. 4005, 4006, and 4007; Invoice Nos. 2574, 2575, and 2576).	Allentown, PA	Manassas, VA

In violation of Title 18, United States Code, Sections 2413 and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney